

Judith D. Riehl  
Executive Director  
St. Louis Lead Prevention Coalition  
2256 South Grand Avenue, 2S  
St Louis, MO 63104-1643

TES

Site: <u>Herculaneum</u>
ID# <u>MO0006266372</u>
Break: <u>1.0</u>
Other: <u>4-9-02</u>

A717

APR 09 2002

Dear Ms. Riehl:

This is in response to your March 12, 2002, letter concerning lead contamination in Herculaneum, Missouri. Your letter states that you believe that the interior cleanup procedures are inadequate, the yard cleanup procedures are inadequate, older children and adults are at risk, and residents are not protected from arsenic and cadmium exposure. You concluded your letter with a request that the Environmental Protection Agency (EPA) list this site on the National Priorities List and offer permanent relocation of residents.

In a letter to Anthony Camillo of your organization, we described the actions being taken to address lead contamination. A copy of that letter is enclosed.

Past experiences have shown that removal of contaminated soil from homes, parks, and schools followed by removal of dusts from the interior of homes are effective ways of reducing the exposure of young children to lead. If at any time, it does not appear that the cleanups are providing a permanent solution, we will take further action to correct that situation.

As for older children and adults being at risk, EPA and the Missouri Department of Natural Resources (MDNR) have been closely working with the Missouri Department of Health and Senior Services (MHSS), and the Agency for Toxic Substances and Disease Registry (ATSDR) to help ensure that the required actions will effectively protect public health. These agencies have done considerable work in the Herculaneum community to collect blood samples from residents as well as students in the Herculaneum schools.

Our highest priority has been the exposure of young children to lead in Herculaneum. In 2001 and 2002, over 1600 adults and children over six year old were tested. Of these, 22 were considered as having elevated blood lead levels (less than 2%). A February 26, 2002, Health Consultation reported 28% of children under six in the 63048 zip code as having elevated blood lead levels, with 45% of the children under the age of six living in the near vicinity of the smelter as having elevated blood lead levels.

This data continues to support our position that young children should be our highest priority. Thus, the most immediate efforts to remove soils and clean the interior of homes as well as the offer for temporary relocation were provided to residents with young children. Note however, the soil removal and interior dust cleaning programs will be performed at all residences

ARTD: APETRUSKA: cschmaltz: Disk 3: Lead Coalition3 R7-0200124 Due 04-01-02

ARTD  
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COZAD

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SANDERSON

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*[Signature]*

RA  
GUILLERMO

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SUPERFUND RECORDS

exceeding the cleanup levels. Residences with older children and adults will be cleaned on a schedule based upon the levels of lead found in the soils on the exterior of the homes.

As for arsenic and cadmium exposure, confirmation samples collected in and around residences have been analyzed for arsenic and cadmium. We will continue to work with MHSS, ATSDR, and the Jefferson County Health Department (JCHD) to determine the risks posed by lead as well as other contaminants in the community. If risks are identified which are not adequately being addressed by the actions being undertaken, we will pursue other actions to address those risks.

As for your request to permanently relocate residents, please note that any decision regarding permanent relocation will be based upon the effectiveness of the required actions to manage the risks posed by contamination in the community. While approximately 80 residents have signed letters requesting permanent relocation, we have also received copies of several hundred letters from residents asking that this site not be listed on the NPL. This is a very complex, and emotional issue. Our decisions will be based upon sound evidence that permanent relocations are necessary to manage the risks.

Although EPA has not determined that the permanent relocation of residents is necessary, an agreement was recently reached between the state of Missouri and Doe Run that calls for Doe Run to buy-out homes, on a voluntary basis, that are located in close proximity to the smelter. While not directly a party to this agreement, EPA welcomes it as it provides additional and immediate protection of the health of the young children who are at greatest risk due to the location of their home. At the same time, this agreement does not alter any of Doe Run's commitments in existing orders with the agency.

We appreciate your interest in this matter. If you have any questions, please contact Tony Petruska of my staff at 913-551-7637.

Sincerely,

James B. Gulliford  
Regional Administrator

Enclosure

cc: Dave Mosby  
MDNR  
Denise Jordan-Izaguirre  
ATSDR  
Gale Carlson  
MHSS



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

APR 09 2002

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OFFICE OF  
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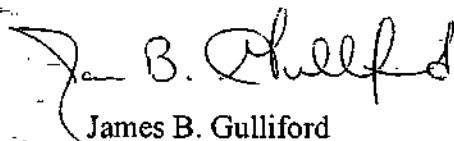
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